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July 9, 2025

The Honorable Jennifer H. Rearden
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Edwin Pagan III and David Macey, 24-cr-641 (S.D.N.Y.)

Dear Judge Rearden:

We represent David Macey in the above-captioned case. Mr. Macey and Mr. Pagan respectfully request a two-week extension of the deadline to file pretrial motions, currently due July 11, 2025, to July 25, 2025. Under this schedule, responses would be due on August 15, and replies would be due on August 25. The parties originally sought a pretrial motions deadline of June 20, which the Court so-ordered, and later requested the current schedule at the parties' May 29 conference, which the Court accepted. *See* ECF 43, 44, 58. The government does not object to this request.

The parties continue to engage in productive discussions around pretrial motions and related issues. An extension of the deadline would allow the parties to continue those discussions and potentially avoid unnecessary motion practice. The next conference in this case is scheduled for October 28. No deadlines or scheduled dates would be affected by such an extension.

Respectfully submitted,



David Patton

cc: Chris DeCoste, Esq.
Emily Deininger, AUSA
Mathew Andrews, AUSA
David Markewitz, AUSA